

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES,)	
)	
Plaintiff,)	
)	
v.)	No. 18 CR 00478-1
)	
QUAN SHUN CHEN,)	Judge Edmond E. Chang
)	
Defendant.)	

UNOPPOSED MOTION FOR RETURN OF DEFENDANT’S PASSPORT

COMES NOW, Defendant Quan Shun Chen, represented by the undersigned counsel, and respectfully **alleges and prays**:

1. On or around August 21, 2018 Quan Shun Chen (“Mr. Chen”) was arraigned in connection with this matter. On the same date, he reported to Pretrial Services and surrendered his passport.
2. On April 3, 2019, Mr. Chen was sentenced in connection with this matter to one month imprisonment with no further supervised release.
3. On June 19, 2019 Mr. Chen completed his sentence and was released from federal custody.
4. On June 26, 2019 Mr. Chen contacted Pretrial Services regarding having his passport returned, and the Pretrial Services division indicated that while they are still in possession of the passport, that it could only be returned upon court order.
5. Due to Mr. Chen making all appearances and now having completed his sentence, Mr. Chen requests that the Court order the Pretrial Services to arrange for the return of Mr. Chen’s passport.

6. The Government has been apprised of this motion and has stated that it may be made unopposed.

Respectfully submitted,

QUAN SHUN CHEN
DEFENDANT

/s Michael Raff

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